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**From:** Sutton, Douglas [dsutton@hgl.com]  
**Sent:** 8/6/2014 7:12:04 PM  
**To:** Rossi, Debra [Rossi.Debra@epa.gov]  
**CC:** Susanna A. Mays [susanna@trustsc.com]; Michael P. Sherrier (michael.p.sherrier@dupont.com) [michael.p.sherrier@dupont.com]; Miller, Theresa [theresa\_miller@golder.com]  
**Subject:** DS&G follow-up items  
**Attachments:** DS&G UPCUTZ and UPA position.pdf

Debbie,

There are several items that I wanted to get to you before you leave. Ex. 6 Personal Privacy (PP) hopes that you can distribute as needed to your team. Here is a list of those items. Each one is discussed in more detail below.

1. Addressing low frequency detections in PRG calculations
2. Classification of UPCUTZ
3. Background sampling for PFCs
4. Modeling kickoff meeting

1. Addressing Low Frequency Detections in PRG Calculations (input from Linda Watson requested)

EPA Comment: Section 3.2, Selection of Chemicals of Potential Concern for Human Health Risk Assessment, Frequency of Detection: EPA no longer eliminates contaminants based on frequency of detection. All contaminants that fail screening must be included in the risk assessment. Once the risk is transparent, contaminants can then be eliminated based on background statistical analysis (using ProUCL software statistics).

Response and Request: In response to the comment provided above, we offer the following: The use of frequency of detection (less than 5%) for the selection of COPCs is consistent with the approach outlined in the USEPA Risk Assessment for Superfund (RAGs) Part A Guidance (USEPA, 1989), and has historically been considered standard practice in the preparation of a human health risk assessment. Since it is indicated that EPA no longer allows for elimination of COPCs based on the frequency of detection, please provide the appropriate written policy and/or guidance, so Golder can evaluate how the policy/guidance should be incorporated into the risk assessment.

In addition, ProUCL software is unable to calculate 95UCLs for analytes with a low frequency of detection; therefore, the maximum detected concentration would have to be used as the exposure point concentration (EPC) in place of a 95UCL. Using this method does not allow for elimination of COPCs based on background statistical analysis, as stated in the EPA comment above, but rather causes inclusion of statistically insignificant COPCs, results in the overestimation of exposure for a number of constituents, and does not reflect actual Site conditions. Please note that background concentrations in groundwater have not been evaluated for the Site; therefore, a statistical background analysis cannot be undertaken. Please clarify if those constituents with a low frequency of detection may be eliminated once the risk characterization has been undertaken.

2. Classification of the UPCUTZ.

Thank you for your email earlier. Golder was preparing a position on UPCUTZ classification on behalf of the Trust over the past several days. The position, which references the Delaware Geologic Society (DGS), is attached. Golder will continue its discussions with the DGS, and potentially USGS, if the matter needs further clarification.

3. PFC Sampling

The Trust will not be sampling PFCs in site monitoring wells or background monitoring wells. Golder has been reviewing wells that could potentially be used as background wells. When that work is completed, their findings will be forwarded to EPA.

#### 4. Modeling meeting

In our June 12, 2014 meeting we had discussed starting the groundwater modeling effort with a kickoff meeting. The Trust has selected its groundwater modeling contractor, and we would like to discuss potential dates for a kickoff meeting with EPA. A preliminary look at our schedules suggests that sometime during the week of August 18<sup>th</sup> would work. We know that the following few weeks would not work. Can you look into availability for a modeling kickoff meeting during the week of August 18<sup>th</sup>, the week of September 15<sup>th</sup>, and the week of September 22<sup>nd</sup>?

If there is someone you would like us to work with or talk to in your absence to follow-up on any of these items, please let me know.

Thank you,

Doug

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